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and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
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**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS
CLAIMS OBJECTION SCHEDULED FOR HEARING ON AUGUST 28, 2013**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the following omnibus claims objection (the "Claim Objection") with the Court for hearing on August 28, 2013:

Four Hundred and Twenty-Eight Omnibus Objection to Claims (Subordinated Guarantee Claims) [Docket No. 38967].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of August 23, 2013 at 4:00 p.m. (the “Response Deadline”) for the Claim Objection for parties to object or file responses. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claim Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claim Objection will be granted.

4. Accordingly, LBHI respectfully requests that the proposed order granting the Claim Objection annexed hereto as Exhibit A, which, except for the inclusion of additional language to reference the inclusion of a separate exhibit attached to the proposed order for a proof of claim for which the Claim Objection is adjourned, is unmodified since the filing of the Claim Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: August 26, 2013
New York, New York

**CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd
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EXHIBIT A

(Proposed Order – Docket No. 38967)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**

x

**ORDER GRANTING FOUR HUNDRED AND
TWENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS
(SUBORDINATED GUARANTEE CLAIMS)**

Upon the four hundred twenty-eighth omnibus objection to claims dated July 23, 2013 (the “Four Hundred Twenty-Eighth Omnibus Objection to Claims”)¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to sections 502(b) and 510(a) of title 11 of the United States Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking to classify the Subordinated Guarantee Claims, all as more fully described in the Four Hundred Twenty-Eighth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Twenty-Eighth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Twenty-Eighth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Twenty-Eighth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Twenty-Eighth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Twenty-Eighth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that the portions of the claims listed on Exhibit 1 annexed hereto that relate to the securities identified by ISIN XS0282978666 or ISIN XS0301813522 or the guarantee issued by LBHI in connection therewith, whether liquidated, unliquidated or undetermined, are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the Plan Administrator has adjourned the hearing on the Four Hundred Twenty-Eighth Omnibus Objection to Claims to September 26, 2013 with respect to the portion of the claim listed on Exhibit 2 hereto that relates to ISIN XS0301813522 (Citibank (Switzerland) AG); and it is further

ORDERED that the Court-appointed claims agent is authorized to modify the claims register to reflect this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 428: EXHIBIT 1 - SUBORDINATED GUARANTEE CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
1 Citi International Financial Services, LLC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	58910	XS0301813522	\$20,000.00
2 CITIBANK SINGAPORE LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55849	XS0301813522	\$26,510,000.00
3 CITIBANK SINGAPORE LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	58947	XS0301813522	\$200,000.00 *
4 CITIBANK SINGAPORE LTD.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55850	XS0301813522	\$1,084,000.00 *
5 CITIBANK, N.A. SINGAPORE BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55846	XS0282978666	\$8,413,322.00 *
					XS0301813522	\$9,855,000.00 *
						\$18,268,322.00
6 CITIBANK, N.A. UAE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55850	XS0301813522	\$827,000.00 *
7 CITIBANK, N.A., HONG KONG BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55845	XS0282978666	\$2,726,592.00 *
					XS0301813522	\$11,120,000.00 *
						\$13,846,592.00
8 CITIGROUP GLOBAL MARKETS, INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55392	XS0301813522	\$115,000.00
9 CITIGROUP GLOBAL MARKETS, INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	60605	XS0282978666	\$50,000.00
					XS0301813522	\$125,000.00
						\$175,000.00
10 CREDIT SUISSE AG, HONG KONG BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55845	XS0301813522	\$200,000.00 *
11 SAI KAI PANG / SU KUIEN PANG LIU	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55845	XS0301813522	\$130,000.00 *
					TOTAL	\$ 61,375,914.00

* Plus unliquidated and/or undetermined amounts.

** Only those portions of the claim related to the ISINs listed are subject to the Plan Administrators' Four Hundred Twenty-Eighth Omnibus Objection.

Exhibit 2

OMNIBUS OBJECTION 428: EXHIBIT 2-SUBORDINATED GUARANTEE CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
1 CITIBANK (SWITZERLAND) AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55399	XS0301813522	\$250,000.00
						TOTAL \$ 250,000.00

* Plus unliquidated and/or undetermined amounts.

** Only those portions of the claim related to the ISINs listed are subject to the Plan Administrators' Four Hundred Twenty-Eighth Omnibus Objection.